

**Stanley E. Levine
1700 Grant Building
Pittsburgh, PA 15219**

July 31, 2006

Lawrence H. Norton, Esquire
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

MUR # 5788

Re: Stanley Levine v. Republican Federal Committee
Of Pennsylvania, Santorum 2006 (FED
ID#C00365106) and Rick Santorum

Dear Mr. Norton:

Enclosed please find a Complaint in the above-referenced matter.

Sincerely,


Stanley E. Levine

SEL/cmk
Enclosure

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2006 AUG -7 A 9:33

**BEFORE THE
FEDERAL ELECTION COMMISSION**

Stanley Levine
1700 Grant Building
Pittsburgh, PA 15219

Complainant,

v

MUR No. 5788

Republican Federal Committee of Pennsylvania
(FEC ID#C00044842)
301 Market Street
Suite 900
Harrisburg, PA 17101,

Santorum 2006 (FEC ID#C00365106)
One Tower Bridge
Suite 1440
West Conshohocken, PA 19420; and

Rick Santorum
One Tower Bridge
Suite 1440
West Conshohocken, PA 19420,

Respondents.

COMPLAINT

Complainant files this complaint against the Republican Federal Committee of Pennsylvania; Santorum 2006; and Rick Santorum (collectively, "Respondents"), for violations of the Federal Election Campaign Act and Federal Election Commission regulations, as described below.

A. Disclaimer Violation

1. 11 C.F.R. § 110.11(b)(3) requires that public communications not authorized by a candidate or authorized committee "must clearly state the full name and permanent street address, telephone number, or World Wide Web address of the

person who paid for the communication, and that the communication is not authorized by any candidate or candidate's committee."

2. 11 C.F.R. § 110.11(c)(2)(iii) further requires that for printed communications, the disclaimer "must be printed with a reasonable degree of color contrast between the background and the printed statement."
3. The attached brochure was produced and mailed by Respondents to a family in New Brighton, Pennsylvania.
4. The brochure appears to be a mass mailing under the definition of 11 C.F.R. § 100.27.
5. The brochure contains the statement "Paid for by Republican Federal Committee of PA – Victory 2006."
6. The Republican Federal Committee of Pennsylvania is not an authorized committee.
7. "Victory 2006" is not the name of any registered political committee.
8. The disclaimer does not contain the street address, telephone number, or web address of the Republican Federal Committee of Pennsylvania.
9. The disclaimer is black print on a dark gray background, and is therefore not printed with a reasonable degree of color contrast.
10. This public communication is in plain violation of 11 C.F.R. § 110.11.

B. In-Kind Contribution

11. This communication features written content from Rick Santorum.
12. Rick Santorum was therefore materially involved in this communication, and has met the "conduct" prong of the coordinated communication standard of 11 C.F.R. § 109.21(d)(2).
13. This communication also includes a prominent advertisement for Santorum's website, <http://ricksantorum.com>.
14. That website features express advocacy.

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15. The communication has met the "content" prong of the coordinated communication standard of 11 C.F.R. § 109.21(c)(3).

16. Because the communication has met both the content and conduct prongs, it is an in-kind contribution to Santorum 2006.

17. Upon information and belief, Santorum 2006 has not reported this contribution on its reports to the Commission, nor has the Republican Federal Committee of Pennsylvania reported it as an in-kind contribution to Santorum 2006.

18. Respondents have violated the reporting requirements of the Act, and may have conspired to give an excessive contribution from the Republican Federal Committee of Pennsylvania to Santorum 2006 and Rick Santorum.

Respondents have violated the Federal Election Campaign Act. They should be enjoined from further violations and be fined the maximum amount permitted by law.

Sincerely,

Stanley Levano

SUBSCRIBED AND SWORN to before me this 31st day of July, 2006.

Suzanne D. Schrieber
Notary Public

My Commission Expires:

May 13, 2010

NOTARIAL SEAL
Suzanne D. Schrieber, Notary Public
City of Pittsburgh, Allegheny County
My commission expires May 13, 2010





An important message from Rick Santorum

I recently voted against the Senate Immigration bill (S.2611) because I believe this legislation is not only a danger to our security and unfair to every hardworking taxpayer, but also, above all, it rewards illegal behavior. As you probably have read, Bobby Casey has joined Ted Kennedy and other liberals in supporting this bill. The bottom line, this costly bill does not secure our borders, instead it offers amnesty to those who have entered our country illegally. And it sends a message to the world that we have lost the will to enforce our laws.

I know first hand the important role immigrants have played in helping to build our country. My father and grandparents immigrated to America from Italy and like so many others, they worked hard, followed the rules, and earned their citizenship.

Under this legislation, we would now move those who have broken the law to the front of the line, and treat them the same as legal immigrants. That's not only wrong, but it's a great injustice to those who have immigrated here legally.

I want you to know I will do everything I can to fight this incomprehensible and unfair approach to solving the immigration problem here in America. And I hope you choose to join me in this important fight - log on to RickSantorum.com and sign a petition uniting the thousands of Pennsylvanians who are expressing opposition to granting amnesty to those who have entered our country illegally.

BOBBY CASEY

has come out in support
of AMNESTY
for those who have entered
our country ILLEGALLY.

101 Market Street
Rt. 1, Box 900
Harrisburg, PA 17101

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



For a free, no-obligation copy of the report on "A" - see page 210.

INSIDE:
How you can join
Rick Santorum's fight to prevent
this from happening



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What is Bobby Casey THINKING?

Bobby Casey has come out in favor of amnesty for illegal immigrants, which is included in legislation that the Washington Times has called nothing short of "treachery." We can only assume this is payback for all the illegal money that has been flowing into Casey's Senate campaign.

Here's what the legislation Casey is supporting will do:

- Rewards illegal behavior by giving citizenship to illegal who broke the law
- Only requires illegal a visa to stay 3 of their last 5 years in back taxes
- Expands protections for illegal aliens not given to Americans
- In some cases requires higher wages for illegal aliens than Americans
- Requires our nation to consult with Mexico before securing our borders
- Paves the way for a projected 80 million additional immigrants by 2026
- It will also give out 64 billion dollars
- It will not protect American workers
- Guess employers a pass for hiring illegal aliens
- Protects the ability of law enforcement to do their job



It's hard enough to figure out why Casey joined with Ted Kennedy and others to support legislation that gives amnesty to those who have entered our country illegally. Certainly, that puts our national security at jeopardy.

But probably most absurd is the part of this legislation that provides guaranteed Social Security benefits to illegal aliens for the time they spent in our country illegally.

In fact, even if they used a stolen Social Security card to obtain work, they will receive their accumulated Social Security benefits, including for the time they were breaking the law.



John Rockefeller and STOP this legislation



It is not a coincidence that John Rockefeller, one of the great industrialists of our country, is now a member of the STOP this legislation committee. He is a man who has spent his life building a great country, and he is now a member of the STOP this legislation committee. He is a man who has spent his life building a great country, and he is now a member of the STOP this legislation committee.

John Rockefeller
and STOP this legislation